

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V Draft Permit No. V-99-000
DAWSON MANUFACTURING COMPANY
MORGANFIELD, KY.
May 28, 1999
JIM MORSE, REVIEWER
Plant I.D. # 077-3900-0064
Application Log # G001

SOURCE DESCRIPTION:

Dawson will manufacture bushings made of rubber with steel inserts. These are to be used for the automotive industry. The rubber parts and the steel parts will be manufactured elsewhere. Steel parts will be abraded in the Wheelabrator Tumblast units, cleaned and treated in the phosphating bath, sprayed with adhesive, and bonded to the rubber parts.

COMMENTS:

Spraying of adhesive will be controlled first by particulate filters, then by catalytic oxidation. All operations will be totally enclosed and capture is expected to be 100%. Oxidizer destruction efficiency is projected at 95%.

The Tumblast units have cartridge dust control filters with efficiency of 98%.

The phosphating process has no controls.

Emission factors were provided by the consultant, using a material balance. The writer has reviewed the information provided and concurs with those calculations.

Regulation 401 KAR 59:010 will apply to emissions of particulates from the Wheelabrators, the adhesive spray, and the phosphating process. However, the phosphating process emissions will place that point in the insignificant activities category.

Regulation 401 KAR 59:015 applies to emissions from the two existing natural gas boilers.

Regulation 401 KAR 59:225 will apply to VOC emissions from adhesive spraying.

PERIODIC MONITORING

VOC emission control inlet and outlet temperatures are monitored continuously

Opacity and particulate are assumed to meet limits when controls are in place and functioning.

PM controls are monitored by visual inspection once per shift.

EMISSION AND OPERATING CAPS DESCRIPTION:

Regulation 401 KAR 59:225 restricts VOC emissions from adhesive spraying to 15% of VOC's as applied. The source will still be major for HAP's after controlling VOC's by oxidation.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.